### IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

V.

Case No. 3:09-CV-0298-N

STANFORD INTERNATIONAL BANK, LTD., ET AL.,

Defendants.

## RECEIVER'S 24TH REPORT REGARDING THE CLAIMS & DISTRIBUTION PROCESSES

Receiver Ralph S. Janvey (the "<u>Receiver</u>") hereby files his 24th Report Regarding the Claims & Distribution Processes (the "<u>24th Report</u>"), respectfully stating as follows:

Pursuant to his prior letter to the Court [see Doc. 1583], the Receiver has filed reports with the Court on a continuing basis reflecting the fees and expenses incurred by the Receiver as a result of the claims process.<sup>1</sup> The Receiver now hereby submits his 24th Report, which includes all claim-related fees and expenses incurred between May 2012 and February 2015, as well as all distribution-related fees and expenses incurred between May 2013 and February 2015.<sup>2</sup>

<sup>[</sup>See Doc. 1618 (the "1st Report"); Doc. 1641 (the "2nd Report"); Doc. 1676 (the "3rd Report"); Doc. 1700 (the "4th Report"); Doc. 1714 (the "5th Report"); Doc. 1731 (the "6th Report"); Doc. 1745 (the "7th Report"); Doc. 1764 (the "8th Report"); Doc. 1772 (the "9th Report"); Doc. 1789 (the "10th Report"); Doc. 1851 (the "11th Report"); Doc. 1872 (the "12th Report"); Doc. 1879 (the "13th Report"); Doc. 1897 (the "14th Report"); Doc. 1905 (the "15th Report"); Doc. 1916 (the "16th Report"); Doc. 1926 (the "17th Report"); Doc. 1935 (the "18th Report"); Doc. 1945 (the "19th Report"); Doc. 1951 (the "20th Report"); Doc. 1994 (the "21st Report"); Doc. 2046 (the "22nd Report"); Doc. 2106 (the "23rd Report").]

The Court established the Receiver's claims process in May 2012 [see Doc. 1584] and approved the Receiver's first interim distribution plan (the "<u>1st Interim Plan</u>") in May 2013 [see Doc. 1877]. As a result, the claim-related figures contained in this Report begin in May 2012, and the distribution-related amounts begin in May 2013. Moreover, the fee and expense figures contained herein do not exclude any amounts subject to the Court's holdback order. [See Doc. 1565.]

## PROFESSIONAL FEES & EXPENSES INCURRED AS A RESULT OF THE CLAIMS PROCESS

Between May 2012 and February 2015, **§6,928,929.06** in professional fees and expenses were incurred as a result of the claims process. Of this amount, \$6,246,891.39 was in regard to CD claims processing and the sending of Notices of Determination; \$88,512.89 was in regard to non-CD claims processing; \$574,464.21 was incurred as a result of analyzing and responding to CD claim objections; and \$19,060.57 was incurred as a result of analyzing and responding to non-CD claim objections. The fees and expenses related to the claims process that are attributable to each of the Receiver's professional firms are listed on the following pages:

GILARDI & CO. LLC		
REPORT PERIOD	PROFESSIONAL FEES	EXPENSES
As of May 31, 2012 (1st Report)	\$143,991.25	\$339,260.19
June 1-30, 2012 (2nd Report)	\$246,503.66	\$9,141.09
July 1-31, 2012 (3rd Report)	\$245,596.97	\$15,189.57
August 1-31, 2012 (4th Report)	\$416,174.02	\$1,537.98
September 1-30, 2012 (5th Report)	\$371,832.42	\$1,227.73
October 1-31, 2012 (6th Report)	\$160,901.12	\$330.04
November 1-30, 2012 (7th Report)	\$104,303.44	\$0.00
December 1-31, 2012 (8th Report)	\$94,404.28	\$26.90
January 1-31, 2013 (9th Report)	\$79,991.38	\$1,683.30
February 1-28, 2013 (10th Report)	\$155,928.76	\$8,267.12
March 1-31, 2013 (11th Report)	\$77,906.25	\$6,850.69
April 1-30, 2013 (12th Report)	\$95,668.94	\$904.23
May 1-31, 2013 (13th Report)	\$56,666.70	\$165.06
June 1-30, 2013 (14th Report)	\$48,142.70	\$550.00
July 1-31, 2013 (15th Report)	\$33,689.72	\$342.26
August 1-31, 2013 (16th Report)	\$22,758.65	\$31.02
September 1-30, 2013 (17th Report)	\$20,448.87	\$184.68
October 1-31, 2013 (18th Report)	\$17,368.57	\$202.00
November 1-30, 2013 (19th Report)	\$13,534.07	\$39.66
December 1-31, 2013 (20th Report)	\$12,509.22	\$170.28
January 1-31, 2014 (21st Report)	\$12,782.34	\$153.44
February 1-28, 2014 (21st Report)	\$10,904.88	\$103.93
March 1-31, 2014 (21st Report)	\$10,488.09	\$362.28
April 1-30, 2014 (22nd Report)	\$9,891.91	\$190.01
May 1-31, 2014 (22nd Report)	\$9,496.42	\$12.20
June 1-30, 2014 (22nd Report)	\$15,189.39	\$49.95
July 1-31, 2014 (23rd Report)	\$11,484.38	\$15.96
August 1-31, 2014 (23rd Report)	\$14,042.21	\$169.64
September 1-30, 2014 (23rd Report)	\$11,863.16	\$13.42
October 1-31, 2014 (23rd Report)	\$10,812.16	\$37.93
November 1-30, 2014 (23rd Report)	\$4,999.38	\$2.40
December 1-31, 2014 (24th Report)	\$10,087.80	\$8.92
January 1-31, 2015 (24th Report)	\$6,038.43	\$12.08
February 1-28, 2015 (24th Report)	\$8,930.01	\$615.91
Gilardi Total <sup>3</sup>	\$2,486,131.55	\$387,851.87

The total amount of Gilardi's professional fees reflects a prior reduction of \$7,200.00 relating to activities during July and August 2012, a prior reduction of \$35,000.00 relating to activities during January 2013, and a prior reduction of \$37,000.00 relating to activities during February 2013.

FTI CONSULTING, INC.		
REPORT PERIOD	PROFESSIONAL FEES	EXPENSES
As of May 31, 2012 (1st Report)	\$167,317.20	\$0.00
June 1-30, 2012 (2nd Report)	\$89,735.60	\$0.00
July 1-31, 2012 (3rd Report)	\$184,634.80	\$54.60
August 1-31, 2012 (4th Report)	\$286,457.60	\$98.23
September 1-30, 2012 (5th Report)	\$433,769.20	\$614.19
October 1-31, 2012 (6th Report)	\$394,668.80	\$0.00
November 1-30, 2012 (7th Report)	\$330,664.40	\$0.00
December 1-31, 2012 (8th Report)	\$141,971.20	\$0.00
January 1-31, 2013 (9th Report)	\$41,424.40	\$0.00
February 1-28, 2013 (10th Report)	\$30,757.60	\$0.00
March 1-31, 2013 (11th Report)	\$78,660.80	\$0.00
April 1-30, 2013 (12th Report)	\$69,775.20	\$0.00
May 1-31, 2013 (13th Report)	\$75,636.80	\$0.00
June 1-30, 2013 (14th Report)	\$106,563.60	\$0.00
July 1-31, 2013 (15th Report)	\$52,407.60	\$0.00
August 1-31, 2013 (16th Report)	\$38,332.80	\$0.00
September 1-30, 2013 (17th Report)	\$50,692.00	\$0.00
October 1-31, 2013 (18th Report)	\$80,923.60	\$0.00
November 1-30, 2013 (19th Report)	\$37,736.80	\$0.00
December 1-31, 2013 (20th Report)	\$15,632.00	\$0.00
January 1-31, 2014 (21st Report)	\$15,530.40	\$0.00
February 1-28, 2014 (21st Report)	\$14,899.20	\$0.00
March 1-31, 2014 (21st Report)	\$9,154.40	\$0.00
April 1-30, 2014 (22nd Report)	\$14,433.60	\$0.00
May 1-31, 2014 (22nd Report)	\$8,207.60	\$0.00
June 1-30, 2014 (22nd Report)	\$17,286.40	\$0.00
July 1-31, 2014 (23rd Report)	\$8,556.00	\$0.00
August 1-31, 2014 (23rd Report)	\$4,037.60	\$0.00
September 1-30, 2014 (23rd Report)	\$6,019.20	\$0.00
October 1-31, 2014 (23rd Report)	\$20,114.40	\$0.00
November 1-30, 2014 (23rd Report)	\$9,104.00	\$0.00
December 1-31, 2014 (24th Report)	\$15,190.40	\$0.00
January 1-31, 2015 (24th Report)	\$10,332.00	\$0.00
February 1-28, 2015 (24th Report)	\$40,092.80	\$0.00
FTI Total <sup>4</sup>	\$2,856,540.00	\$152.83

\_

The total amount of FTI's professional fees reflects a prior reduction of \$30,000.00 relating to activities during September and October 2012 and a prior reduction of \$14,180.00 relating to activities during November 2012. Moreover, the total amount of FTI's expenses reflects a prior reduction of \$614.19 for September 2012.

BAKER BOTTS L.L.P.		
REPORT PERIOD	PROFESSIONAL FEES	EXPENSES
As of May 31, 2012 (1st Report)	\$53,948.80	\$792.74
June 1-30, 2012 (2nd Report)	\$65,978.00	\$303.67
July 1-31, 2012 (3rd Report)	\$52,016.00	\$490.39
August 1-31, 2012 (4th Report)	\$69,056.80	\$344.48
September 1-30, 2012 (5th Report)	\$43,242.00	\$286.23
October 1-31, 2012 (6th Report)	\$52,096.00	\$207.09
November 1-30, 2012 (7th Report)	\$27,702.00	\$72.48
December 1-31, 2012 (8th Report)	\$26,104.00	\$157.30
January 1-31, 2013 (9th Report)	\$42,332.80	\$63.66
February 1-28, 2013 (10th Report)	\$35,523.60	\$20.44
March 1-31, 2013 (11th Report)	\$73,120.00	\$223.88
April 1-30, 2013 (12th Report)	\$59,386.40	\$234.67
May 1-31, 2013 (13th Report)	\$49,988.00	\$193.33
June 1-30, 2013 (14th Report)	\$47,905.20	\$55.94
July 1-31, 2013 (15th Report)	\$32,827.60	\$201.35
August 1-31, 2013 (16th Report)	\$29,854.20	\$73.15
September 1-30, 2013 (17th Report)	\$42,338.40	\$225.70
October 1-31, 2013 (18th Report)	\$45,561.20	\$303.01
November 1-30, 2013 (19th Report)	\$44,472.00	\$93.54
December 1-31, 2013 (20th Report)	\$13,106.00	\$13.64
January 1-31, 2014 (21st Report)	\$21,056.00	\$65.60
February 1-28, 2014 (21st Report)	\$5,462.00	\$83.35
March 1-31, 2014 (21st Report)	\$2,584.00	\$3.09
April 1-30, 2014 (22nd Report)	\$20,780.00	\$4.42
May 1-31, 2014 (22nd Report)	\$21,120.00	\$62.66
June 1-30, 2014 (22nd Report)	\$12,280.00	\$23.42
July 1-31, 2014 (23rd Report)	\$20,012.00	\$50.55
August 1-31, 2014 (23rd Report)	\$10,793.20	\$9.24
September 1-30, 2014 (23rd Report)	\$34,192.00	\$19.82
October 1-31, 2014 (23rd Report)	\$18,690.00	\$9.97
November 1-30, 2014 (23rd Report)	\$46,900.00	\$0.00
December 1-31, 2014 (24th Report)	\$40,810.00	\$47.70
January 1-31, 2015 (24th Report)	\$5,190.00	\$7.36
February 1-28, 2015 (24th Report)	\$27,064.00	\$16.74
<b>Baker Botts Total</b>	\$1,193,492.20	\$4,760.61

# PROFESSIONAL FEES & EXPENSES INCURRED AS A RESULT OF THE DISTRIBUTION PROCESS

Between May 2013 and February 2015, **\$1,057,063.90** in professional fees and expenses were incurred as a result of the distribution process. The fees and expenses related to the distribution process that are attributable to each of the Receiver's professional firms are listed below:

GILARDI & CO. LLC		
REPORT PERIOD	PROFESSIONAL FEES	EXPENSES
May 1-31, 2013 (13th Report)	\$5,557.54	\$0.00
June 1-30, 2013 (14th Report)	\$39,542.77	\$734.84
July 1-31, 2013 (15th Report)	\$101,222.98	\$0.00
August 1-31, 2013 (16th Report)	\$68,757.65	\$174.44
September 1-30, 2013 (17th Report)	\$34,923.44	\$0.00
October 1-31, 2013 (18th Report)	\$39,889.64	\$0.00
November 1-30, 2013 (19th Report)	\$45,176.67	\$0.00
December 1-31, 2013 (20th Report)	\$30,300.47	\$3,179.84
January 1-31, 2014 (21st Report)	\$29,063.13	\$790.49
February 1-28, 2014 (21st Report)	\$24,686.02	\$924.53
March 1-31, 2014 (21st Report)	\$20,472.80	\$512.23
April 1-30, 2014 (22nd Report)	\$13,233.69	\$52.58
May 1-31, 2014 (22nd Report)	\$16,347.32	\$238.61
June 1-30, 2014 (22nd Report)	\$25,022.08	\$400.78
July 1-31, 2014 (23rd Report)	\$26,106.30	\$0.00
August 1-31, 2014 (23rd Report)	\$16,450.64	\$619.70
September 1-30, 2014 (23rd Report)	\$17,649.96	\$2.40
October 1-31, 2014 (23rd Report)	\$16,380.51	\$1,120.99
November 1-30, 2014 (23rd Report)	\$14,111.20	\$35.48
December 1-31, 2014 (24th Report)	\$10,629.50	\$8,508.19
January 1-31, 2015 (24th Report)	\$12,587.40	\$8.29
February 1-28, 2015 (24th Report)	\$13,465.17	\$116.16
Gilardi Total	\$621,576.88	\$17,419.55

FTI CONSULTING, INC.		
REPORT PERIOD	PROFESSIONAL FEES	EXPENSES
May 1-31, 2013 (13th Report)	\$0.00	\$0.00
June 1-30, 2013 (14th Report)	\$0.00	\$0.00
July 1-31, 2013 (15th Report)	\$3,276.00	\$0.00
August 1-31, 2013 (16th Report)	\$2,957.60	\$0.00
September 1-30, 2013 (17th Report)	\$8,257.60	\$0.00
October 1-31, 2013 (18th Report)	\$35,849.60	\$0.00
November 1-30, 2013 (19th Report)	\$8,393.60	\$0.00
December 1-31, 2013 (20th Report)	\$10,260.00	\$0.00
January 1-31, 2014 (21st Report)	\$1,824.00	\$0.00
February 1-28, 2014 (21st Report)	\$584.80	\$0.00
March 1-31, 2014 (21st Report)	\$5,445.60	\$0.00
April 1-30, 2014 (22nd Report)	\$588.00	\$0.00
May 1-31, 2014 (22nd Report)	\$1,363.20	\$0.00
June 1-30, 2014 (22nd Report)	\$509.60	\$0.00
July 1-31, 2014 (23rd Report)	\$9,137.60	\$0.00
August 1-31, 2014 (23rd Report)	\$1,244.80	\$0.00
September 1-30, 2014 (23rd Report)	\$44,079.20	\$0.00
October 1-31, 2014 (23rd Report)	\$10,488.80	\$0.00
November 1-30, 2014 (23rd Report)	\$11,055.20	\$0.00
December 1-31, 2014 (24th Report)	\$16,208.00	\$0.00
January 1-31, 2015 (24th Report)	\$550.40	\$0.00
February 1-28, 2015 (24th Report)	\$23,892.00	\$0.00
FTI Total	\$195,965.60	\$0.00

BAKER BOTTS L.L.P.		
REPORT PERIOD	PROFESSIONAL FEES	EXPENSES
May 1-31, 2013 (13th Report)	\$6,849.60	\$22.61
June 1-30, 2013 (14th Report)	\$13,452.00	\$5.56
July 1-31, 2013 (15th Report)	\$17,427.20	\$15.87
August 1-31, 2013 (16th Report)	\$14,902.00	\$4.54
September 1-30, 2013 (17th Report)	\$15,834.00	\$5.89
October 1-31, 2013 (18th Report)	\$27,248.00	\$9.74
November 1-30, 2013 (19th Report)	\$8,868.00	\$7.83
December 1-31, 2013 (20th Report)	\$6,236.00	\$0.00
January 1-31, 2014 (21st Report)	\$4,336.00	\$2.62
February 1-28, 2014 (21st Report)	\$7,068.00	\$0.00
March 1-31, 2014 (21st Report)	\$2,100.00	\$0.00
April 1-30, 2014 (22nd Report)	\$4,236.00	\$3.10
May 1-31, 2014 (22nd Report)	\$25,044.00	\$0.04
June 1-30, 2014 (22nd Report)	\$9,279.20	\$103.23
July 1-31, 2014 (23rd Report)	\$3,312.00	\$2.05
August 1-31, 2014 (23rd Report)	\$7,640.00	\$13.93
September 1-30, 2014 (23rd Report)	\$14,648.00	\$6.20
October 1-31, 2014 (23rd Report)	\$20,380.00	\$13.74
November 1-30, 2014 (23rd Report)	\$7,304.00	\$15.21
December 1-31, 2014 (24th Report)	\$4,976.00	\$7.71
January 1-31, 2015 (24th Report)	\$224.00	\$0.00
February 1-28, 2015 (24th Report)	\$498.00	\$0.00
Baker Botts Total	\$221,862.00	\$239.87

#### **ONGOING CLAIMS & DISTRIBUTION ACTIVITIES**

The following is an update concerning the activities of the Receiver and his professionals with regard to claims processing and distribution matters:

- 30,652 claims have been received through both the prior claims process and the Court-approved claims process. Of these claims, 18,038 are unique SIB CD or other SIB investor claims; 1,970 are unique non-CD claims; 10,266 are duplicates of claims already submitted (of which 9,744 are CD claims and 522 are non-CD claims); and 378 are late claims that were served upon the Receiver after the Court-approved Bar Date expired (of which 341 are CD claims and 37 are non-CD claims). As a result, there are 20,008 unique, timely claims.
  - Reconciliation activities regarding 18,599 of the unique, timely claims have been substantially completed. Of these, 17,905 are CD claims, and 694 are non-CD claims.
  - o 130 of the unique, timely claims are deficient due to a lack of required information on the claimants' claim forms. Gilardi and, in some necessary instances, Baker Botts have contacted the claimants who submitted those claims whether through the dissemination of formal Notices of Deficiency or through more informal means of communication to obtain the missing information. Further reconciliation activities concerning such claims cannot proceed without the required information. Of these deficient claims, 125 are CD claims, and 5 are non-CD claims.
  - o The remaining 1,279 unique, timely claims are being manually reconciled by Gilardi and Stanford Staff and, in limited and necessary instances, FTI or Baker Botts. Of these, 8 are CD claims, and 1,271 are non-CD claims.
- The mailing of Notices of Determination commenced in January 2013 and will continue on a rolling basis until completed. Thus far, 15,227 Notices of Determination and 793 Amended Notices of Determination have been disseminated with respect to 26,498 claims. Of the claims subject to Notices of Determination, 17,316 are unique CD claims; 8 are unique non-CD claims; 9,171 are duplicate CD claims; and 3 are duplicate non-CD claims.
- The Receiver has received 2,885 objections to his Notices of Determination. Of these, 2,692 have been fully resolved (including, *inter alia*, Amended Notices of Determination that have been sent), and only 2 unresolved objections have been filed with the Court. All but 2 of the objections received thus far are in regard to CD claims.
- Beginning in late 2012 and continuing on a rolling basis, the Receivership has
  received requests from third-party claim purchasers to acknowledge "notices of
  transfer" with respect to their purchase of claims from the original CD claimants.

Starting in August 2013, in order to limit the financial burden that processing notices of transfer and issuing acknowledgements of transfer would otherwise impose on the Receivership Estate, the Receiver has required claim purchasers to pay transactional fees with respect to proposed transfers. To date, the Receiver's team has fully reviewed and acknowledged notices of transfer with respect to 434 unique CD claims and 217 duplicative CD claims. The Receiver's team has reviewed or is in the process of reviewing 59 additional notices of transfer but is awaiting further information from the claim purchasers or the original CD claimants before issuing any acknowledgements concerning eligible transfers.

- On April 11, 2013, the Court approved the Settlement Agreement and Cross-Border Protocol (the "Protocol") between the Receiver and the Antiguan Joint Liquidators (the "JLs"). [See Doc. 1844.] The Protocol stated, inter alia, "Information regarding claims from putative Creditor-victims that are filed with the Receiver, with the JLs, or with both shall be exchanged between the Receiver and the JLs." [See Doc. 1792 at 18-19.] Pursuant to those terms, the Receiver and the JLs have exchanged claims-submission information. The Receiver's team has since reviewed the vast majority of the CD claims submitted to the JLs on or before the Court's Bar Date of September 1, 2012, and the Receiver intends to issue Conditional Notices of Determination with respect to eligible JL claims on a rolling basis beginning in the near future. The Conditional Notices of Determination will be conditional and effective only upon the claimants' submission to the Receiver of an enclosed consent to U.S. jurisdiction (modeled upon the language contained in the Court's prior Bar Date Order [cf. Doc. 1584]), and each Conditional Notice of Determination will also be accompanied by a certification notice regarding collateral-source recoveries (in conformity with the Court's prior guidance [cf. Doc. 1877 at 8]). Such procedure is consistent with the Court-approved Protocol, which states in relevant part: "The Receiver will include in his claims process claims filed with the JLs prior to the Receiver's bar date[.] Notwithstanding the foregoing, any claimant who is unwilling to submit himself or herself to the jurisdiction of the US Court in relation to the submission, evaluation, and payment of such claimant's claim will not be included in the Receiver's claims process[.]" [See Doc. 1792 at 19.]
- The Court's Order granting the 1st Interim Plan requires the Receiver to disseminate certification notices concerning collateral-source recoveries to investor CD claimants. [See Doc. 1877 at 8.] The Receiver has thus far sent certification notices to CD claimants regarding 17,098 unique CD claims and has processed certification forms received in response for 14,316 of those unique CD claims.
- The Receiver has thus far filed eleven Schedules of Payments to be Made Pursuant to the 1st Interim Plan.<sup>5</sup> 12,802 unique CD claims (and 7,013 duplicate

<sup>&</sup>lt;sup>5</sup> [See Docs. 1903, 1903-1 (the "<u>1st Interim Plan's Schedule 1</u>"); Docs. 1912, 1912-1 (the "<u>1st Interim Plan's Schedule 2</u>"); Docs. 1922, 1922-1 (the "<u>1st Interim Plan's Schedule 3</u>"); Docs. 1924, 1924-1 (the "<u>1st Interim Plan's Schedule 3</u>"); Docs. 1924, 1924-1 (the "<u>1st Interim Plan's Schedule 5</u>"); Docs. 1932, 1932-1 (the "<u>1st Interim Plan's Schedule 5</u>"); Docs. 1942, 1942-1 (the "<u>1st Interim Plan's Schedule 7</u>"); Docs. 1965, 1965-1 (the "<u>1st Interim Plan's Plan's Schedule 7</u>");

CD claims) are listed in those eleven Schedules, and those CD claims were included in the Schedules because completed certification forms were returned and processed as complete and eligible for distribution by the Receiver. The total amount to be distributed pursuant to those Schedules is approximately \$35.3 million. Additional Schedules under the 1st Interim Plan will be submitted by the Receiver on a rolling basis as further responses to certification notices are received and processed.

- The Court granted the Receiver's motion for approval of the second interim distribution plan (the "2nd Interim Plan") on July 2, 2014. [See Doc. 2037.] The Receiver has thus far filed one Schedule of Payments to be Made Pursuant to the 2nd Interim Plan. 10,574 unique CD claims (and 5,677 duplicate CD claims) are listed in that Schedule, and all of those CD claims had also previously appeared in the ten Schedules under the 1st Interim Plan. The total amount to be distributed pursuant to the Schedule is approximately \$11.8 million.
- Baker Botts continues to draft and submit reports to the Court regarding the claims and distribution processes and to monitor and oversee those processes and the fees and expenses related thereto.

Schedule 8"); Docs. 2011, 2011-1 (the "1st Interim Plan's Schedule 9"); Docs. 2084, 2084-1 (the "1st Interim Plan's Schedule 10"); Docs. 2109, 2109-1 (the "1st Interim Plan's Schedule 11").]

<sup>&</sup>lt;sup>6</sup> [See Docs. 2097, 2097-1 (the "2nd Interim Plan's Schedule 1").]

Dated: April 2, 2015 Respectfully submitted,

### BAKER BOTTS L.L.P.

By: /s/ Kevin M. Sadler

Kevin M. Sadler
Texas Bar No. 17512450
kevin.sadler@bakerbotts.com
Scott D. Powers
Texas Bar No. 24027746
scott.powers@bakerbotts.com
David T. Arlington
Texas Bar No. 00790238
david.arlington@bakerbotts.com
1500 San Jacinto Center
98 San Jacinto Blvd.
Austin, Texas 78701-4039
(512) 322-2500
(512) 322-2501 (Facsimile)

Timothy S. Durst Texas Bar No. 00786924 tim.durst@bakerbotts.com 2001 Ross Avenue Dallas, Texas 75201 (214) 953-6500 (214) 953-6503 (Facsimile)

ATTORNEYS FOR RECEIVER RALPH S. JANVEY

### **CERTIFICATE OF SERVICE**

I certify that on April 2, 2015, I electronically filed the foregoing document with the Clerk of the Court for the Northern District of Texas, Dallas Division, using the CM/ECF system. The ECF system will send a "Notice of Electronic Filing" to all counsel of record who have consented in writing to accept service of this document by electronic means.

I further certify that on April 2, 2015, I served a true and correct copy of the foregoing document and the notice of electronic filing by United States Postal Service Certified Mail, Return Receipt requested, to the persons noticed below who are non-CM/ECF participants:

R. Allen Stanford, Pro Se Inmate #35017183 Coleman II USP Post Office Box 1034 Coleman, FL 33521 Via Certified Mail, Return Receipt Requested

/s/ Kevin M. Sadler
Kevin M. Sadler